

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JIM DAWS TRUCKING, LLC,)	CASE NO. 4:24-CV-3177
)	
Plaintiff,)	
)	
v.)	DEFENDANTS’
)	SUPPLEMENTAL BRIEF IN
DAWS, INC.; JAMES R. DAWS; LANA R.)	SUPPORT OF MOTION TO
DAWS; DAWS TRUCKING, INC.; and)	INCREASE SURETY BOND
COLUMBUS TRANSPORTATION &)	
LOGISTICS, LLC,)	
)	
Defendants.)	

Defendants submit this supplemental brief to advise the Court of a recent development that affects the relief Defendants sought in their motion to increase the surety bond. (Filing 118). Circumstances have changed since Defendants filed their brief in support of their motion to increase the surety bond on April 14, 2025 (Filing 120). On April 16, 2025, Loyal Trucking, LLC (“Loyal”), paid Jim the full amount Loyal owed Jim under the Redemption Agreement. (Filing 122).

As a result of this payment, the preliminary injunction no longer prohibits Loyal from operating. See ([Filing 113 at ECF p. 15, n.6](#)) (“If Loyal wants to operate, it must pay Jim the full amount owed to him under its redemption agreement.”). Consequently, that part of Defendants’ motion asking the Court to increase the security bond to account for potential damage to Loyal and its drivers from the preliminary injunction is moot, and Defendants withdraw that part of its motion.

Due to this change in circumstances regarding Loyal, Defendants revise their request relating to the bond. For the reasons stated in its initial brief, after removing the request relating to Loyal, Defendants request that the bond be increased to \$1,197,888.55 as follows:

JLD	\$ 480,000.00
Daws, Inc.	\$ 517,888.55
Jim Daws	\$ 200,000.00
Total	\$ 1,197,888.55

DATED this 17th day of April, 2025.

DAWS, INC., JAMES R. DAWS,
LANA R. DAWS, DAWS TRUCKING, INC.
and COLUMBUS TRANSPORTATION &
LOGISTICS, LLC, Defendants

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CERTIFICATE OF COMPLIANCE

Pursuant to NECivR 7.1(d), counsel certifies that this brief contains 422 words including all text, captions, headings, footnotes, and quotations according to the word count function of Microsoft Word 365.

/s/ Timothy J. Thalken

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of April, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

/s/ Timothy J. Thalken

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